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April 6, 2016

VIA FEDERAL EXPRESS

Mr. Jonathan Gorin
Emergency Response and Remedial Response Division
U.S. Environmental Protection Agency, Region 2
290 Broadway, 19th Floor
New York, New York 10007

Re: Request for Information Pursuant to Section 104 of CERCLA
LCP Chemicals, Inc. Superfund Site – Linden, New Jersey

Dear Mr. Gorin:

We represent G-I Holdings Inc. (“G-I”) and write in connection with Nicoletta DiForte’s January 31, 2016 letter enclosing the United States Environmental Protection Agency (the “EPA”)’s Request for Information (the “RFI”) pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601 *et seq.*, concerning the LCP Chemicals, Inc. Superfund Site in Linden, New Jersey. Pursuant to our agreement with your colleague Frank Cardiello, we received an extension until today’s date to respond to the EPA’s RFI.

Enclosed are G-I’s Responses and Objections to the RFI (the “RFI Response”) along with an electronic production of responsive documents located after a reasonably diligent search. Those documents that G-I is claiming to be confidential have been expressly identified and bates-stamped as such and are to be treated as confidential by the EPA moving forward, and until further notice, in their entirety, unless otherwise specified in the RFI Response. G-I reserves the right to supplement its RFI Response should additional information or documents become known or available to it. Further, G-I reserves all of its rights in connection with this matter.

Please do not hesitate to contact me at 212-849-7282, or my colleague Sylvia Simson at 212-849-7378, if you have any questions regarding G-I’s RFI Response or would like to discuss further.

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Very truly yours,



Andrew J. Rossman

Encl.

CC : Frank Cardello, Esq. (by Federal Express)
Sylvia E. Simson, Esq. (via email)
Dennis J. O'Grady, Esq. (via email)
Mark E. Hall, Esq. (via email)